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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

IN RE SILVER WHEATON CORP. SECURITIES LITIGATION) CASE No.: 2:15-CV-05146-CAS) (JEMx)) c/w: 2:15-CV-05173-CAS (JEMx))) PLAINTIFFS' MOTION TO) COMPEL)) <u>CLASS ACTION</u>)) JUDGE: Hon. John E. McDermott) Hearing Date: February 6, 2018) Time: 10:00 a.m.) Complaint Filed: July 8, 2015) Discovery Cut-Off: March 29,) 2018) Pretrial Conference Date:) February 25, 2019) Trial Date: March 26, 2019))))
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on February 6, 2018 at 10:00 a.m., or as soon thereafter as the matter may be heard in Courtroom 7D of the above-entitled Court, located at 312 N. Spring Street, Los Angeles, CA 90012, California, Lead Plaintiff Joe Elek, and named Plaintiffs Thomas Bartsch, Larry Brandow, Diana Choi, Benjamin Potaracke, Jędrzej Borowczyk, and Charles Remmel (together, “Plaintiffs”), by their undersigned counsel, will and hereby do move the Court, pursuant to Rules 26(c) and 37(a) of the Federal Rules of Civil Procedure, to compel defendants Silver Wheaton Corp., Randy V.J. Smallwood, Peter Barnes, and Gary Brown (“Defendants”) to produce documents.

This Motion is made pursuant to Local Rule 37-2 and is based on the parties’ attached Joint Stipulation and the exhibits and declarations attached thereto, any supplemental memoranda filed pursuant to Local Rule 37-2.3, such additional evidence and argument as may be presented at the hearing on this motion, all of the pleadings, files and records in this proceeding, and such other evidence as may later be submitted.

The parties have corresponded at length and met and conferred on several occasions, most recently on November 8, 2017.

Dated: January 16, 2018

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen

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Attorneys for Lead Plaintiffs

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CERTIFICATE OF SERVICE

I, Laurence Rosen, hereby declare under penalty of perjury as follows:

I am attorney with the Rosen Law Firm, P.A., with offices at 355 South Grand Avenue, Suite 2450, Los Angeles, CA, 90071. I am over the age of eighteen.

On January 16, 2018, I electronically filed the foregoing **PLAINTIFFS' MOTION TO COMPEL** with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to counsel of record.

Executed on January 16, 2018.

/s/ Laurence Rosen
Laurence Rosen